

THE HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

TRANSFIELD ER CAPE LIMITED (IN  
LIQUIDATION),

Plaintiff,

v.

NORTH CHINA SHIPPING LIMITED;  
NORTH CHINA SHIPPING HOLDINGS  
COMPANY LIMITED, HONG KONG;  
GREAT PERIOD INVESTMENTS  
LIMITED; MARINA PERIDOT SHIPPING  
LIMITED,

Defendants.

IN ADMIRALTY

Case No. 3:12 CV-06091-BHS

**CLAIM OF WINPLUS ENERGY,  
LTD.**

WINPLUS ENERGY LTD.,

Plaintiff,

v.

The M/V OEL CONFIDENCE, her engines,  
tackle and apparel, etc., *in rem*, and OCEAN  
FAITH INTERNATIONAL SHIPPING  
LIMITED, *in personam*,

Defendants.

Pursuant to Supplemental Admiralty Rule C(6), WINPLUS ENERGY LTD., through  
counsel, hereby notifies all interested parties that, pursuant to 46 U.S.C. § 31341 *et seq.*, it  
claims a maritime lien on the vessel M/V/ OEL CONFIDENCE Official Number 9628910, her  
CLAIM OF WINPLUS ENERGY, LTD. - 1  
CASE NO. 3:12 CV-06091-BHS

LANE POWELL PC  
1420 FIFTH AVENUE, SUITE 4100  
SEATTLE, WASHINGTON 98101-2338  
206.223.7000 FAX: 206.223.7107

1 engines, gear, nets, furniture, etc. because of fuel and other marine supplies and services  
2 furnished to the vessel on or about December 14 and 15, 2012 by WINPLUS ENERGY LTD.  
3 In the amount of \$845,900.00 which amount is outstanding and unpaid, plus interest and debt  
4 collection costs.

5 DATED: January 17, 2013

6 LANE POWELL PC

7  
8 By   
9 Mark G. Beard, WSBA No. 11737  
10 Attorneys for Plaintiff Winplus Energy Ltd.

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27 CLAIM OF WINPLUS ENERGY, LTD. - 2  
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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of January, 2013, I electronically filed the foregoing Complaint in Intervention of Winplus Energy Ltd. with the Clerk of the Court using the CM/ECF system which will provide notification of such filing to the following listed persons and have provided a copy of the same via electronic mail, facsimile and/or be depositing the same in the U.S. Mail, postage prepaid and properly addressed as follows:

Christopher W. Nicoll, Esq.  
Jeremy B. Jones, Esq.  
Nicoll Black & Feig  
1325 5<sup>th</sup> Avenue, Suite 1650  
Seattle, WA 98101

George M. Chalos, Esq.  
Chalos & Co., P.C.  
55 Hamilton Avenue  
Oyster Bay, NY 11771

  
Heidi Carchano

**UNSWORN DECLARATION UNDER PENALTIES OF PERJURY**

I, Jong Moon Han, on behalf of the Plaintiff in the foregoing matter, hereby declare, in accordance with Section 1746 of Title 28 of the United States Code, that:

I am the Managing Director of Winplus Energy Ltd. and, as such, am authorized to make this declaration; I have read the foregoing Complaint and am familiar with its contents, which contents are true to my personal knowledge or based upon my information and belief; as to those matters based on information and belief, I believe them to be true; and the sources of my information and the grounds for my belief are matters personally known to me and records of said company.

As reflected in the foregoing Complaint, Winplus Energy Ltd. supplied marine bunker fuel to the Vessel on December 13 and 14, 2012, at a value of US\$845,900.00; Winplus Energy Ltd has not been paid; and Winplus Energy Ltd. is entitled to a maritime lien against the Vessel.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 17th, 2013.



Jong Moon Han  
(Printed Name)